

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION**

IN RE: §
MOM MANGEMENT, LLC, § **CASE NO. 98-70041**
DEBTOR. §

APPLICATION FOR PAYMENT OF DIVIDEND FROM UNCLAIMED FUNDS

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY (20) DAYS
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED IN THE
MOTION MAY BE GRANTED WITHOUT A HEARING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO
BE HELD.**

To The Honorable United States Bankruptcy Judge

Now comes Continental Casualty Company, the Claimant identified below, and requests an Order authorizing payment of unclaimed funds now on deposit in the Treasury of the United States for the benefit of Claimant and represents that:

1. Claimant was a creditor in the above-captioned bankruptcy case having timely filed a proof of claim in the amount of \$19,647.40. Claimant has not received payment of these funds that are due and owing to the Claimant.
2. Claimant further shows that Claimant is:

NAME OF CLAIMANT: Continental Casualty Company

MAILING ADDRESS: CNA Companies
2405 Lucien Way
Maitland, FL 32751

and that a dividend in the amount of \$16,316.19 was awarded in this case to the Claimant, which dividend is currently unclaimed and held by the Clerk of Court.

3. The address to which the Trustee attempted to send payment was an old address.
4. The affidavit lf Mr. Al Hammond, on behalf of the Claimant and in support of this Application, is attached hereto as Exhibit "A" and is incorporated by this reference.

FOR THESE REASONS, Claimant requests the Court to enter an Order authorizing payment of the pro rata dividend due upon this claim.

Dated this 16th day of October, 2006.

PLUNKETT & GIBSON, INC.
70 N.E. Loop 410, Suite 1100
San Antonio, Texas 78216
Telephone 210-734-7092
Telecopier 210-734-0379

BY: /s/ Patrick H. Autry
Patrick H. Autry
State Bar No. 01447600
ATTORNEYS FOR CLAIMANT

CERTIFICATE OF SERVICE

In accordance with Title 28 U.S.C. § 2042, the undersigned hereby certifies that on the 16th day of October 2006 a true copy of this application with all required attachments was served by U.S. mail at the following address upon the following:

U.S. Attorney
Midland Division
U.S. Courthouse
400 W. Illinois St., Suite 1200
Midland, TX 79701

Janet S. Casiato Northrup
4615 SW Freeway, Suite 410
Houston, TX 77027

U.S. Attorney
601 NW Loop 410, Suite 600
San Antonio, TX 78216

Attorney General of the United States
Main Justice Building, Room 5111
10th and Constitution Avenue, NW
Washington, DC 20530

/s/ Patrick H. Autry
Patrick H. Autry

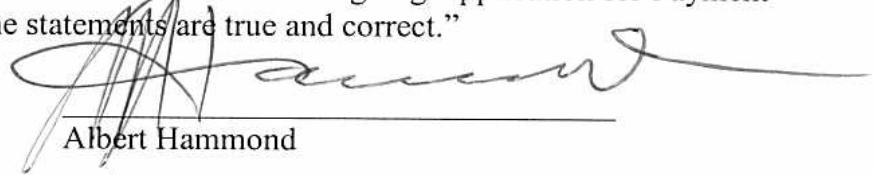
Exhibit A – Affidavit of Al Hammond

State of :
:
County of :

AFFIDAVIT OF ALBERT HAMMOND

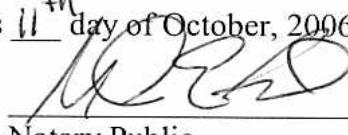
Before me, the undersigned authority appeared Albert Hammond who being duly sworn according to law stated:

"My name is Albert Hammond. I am employed by Continental Casualty Company, the Claimant, as a Legal Collections Specialist and am authorized to make this affidavit on their behalf. I have reviewed the statements of fact set forth in the foregoing Application for Payment of Dividend from Unclaimed Funds. The statements are true and correct."



Albert Hammond

Sworn and subscribed before me this 11th day of October, 2006.



Notary Public

State of IL

My commission expires: 12/30/09

9000.106.307640v1

"OFFICIAL SEAL"
MARTIN E. RIDLEY
Notary Public, State of Illinois
My Commission Expires 12-30-09
